IN THE UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF TEXAS FORT WORTH DIVISION

MIDAS GREEN TECHNOLOGIES, LLC)
Plaintiff,) Case No. 4:20-cv-00555-O
v.)
IMMERSION SYSTEMS LLC)
Defendant.	<i>)</i>)

DEFENDANT'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE RESPOND TO THE COMPLAINT

Defendant Immersion Systems LLC ("Immersion"), pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, files its Unopposed Motion for an Extension of Time to Answer or Otherwise Respond to the Complaint and states as follows:

- 1. Plaintiff Midas Green Technologies, LLC ("MGT") filed this action against Immersion on May 29, 2020, bringing a claim against Immersion for patent infringement of federal patent No. 10,405,457.
- 2. Immersion accepted service of the Complaint on June 23, 2020, thereby allowing Immersion until July 14, 2020 to respond to the Complaint.
- 3. However, because the parties are prepared to engage in good-faith discussions regarding the claim set forth in the Complaint in compliance with LR 16.3(a), the parties have agreed that it would be appropriate to extend the deadline for Immersion to answer or otherwise plead in response to the Complaint until August 11, 2020.
- 4. Counsel for Immersion has conferred with counsel for MGT, and MGT has no objection to and is unopposed to the extension requested herein.
 - 5. This Motion is brought in good faith and for good cause, is not for any improper

purpose, and granting the requested extension will not cause any prejudice or undue delay.

WHEREFORE, Defendant Immersion Systems LLC respectfully requests that this Court grant this Unopposed Motion for an Extension of Time to Answer or Otherwise Respond to the Complaint and extend the deadline for it to answer or otherwise plead in response to the Complaint to August 11, 2020.

Dated: July 14, 2020

Respectfully submitted,

By: /s/ Kenneth C. Riney

Peter M. Spingola

(Application for Admission Pro Hac Vice to be Filed)

Illinois Bar No. 6243942

E-Mail: pspingola@chapmanspingola.com

Alexander G. Karl

(Application for Admission Pro Hac Vice to be Filed)

Illinois Bar No. 6329903

E-Mail: akarl@chapmanspingola.com

CHAPMAN SPINGOLA, LLC

190 South LaSalle Street, Suite 3850

Chicago, IL 60603

Telephone: (312) 630-9202 Facsimile: (312) 630-9233

-and-

Kenneth C. Riney

Texas Bar No. 24046721

E-Mail: kriney@krcl.com

Andrew D. Robertson

Texas Bar No. 24090845

E-Mail: drobertson@krcl.com

KANE RUSSELL COLEMAN LOGAN PC

901 Main Street, Suite 5200

Dallas, Texas 75202

Telephone: (214) 777-4200

Facsimile: (214) 777-4299

COUNSEL FOR DEFENDANT IMMERSION SYSTEMS LLC

CERTIFICATE OF CONFERENCE

On the 9th day of July 2020, Peter M. Spingola and Alexander G. Karl, counsel for Defendant, conferred with Artie Pennington, counsel for Plaintiff, who advised that Plaintiff is unopposed to the relief sought by Defendant in this Motion.

/s/ Peter M. Spingola
Peter M. Spingola

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this the 14th day of July 2020, a copy of the foregoing document was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to counsel for Plaintiff by operation of the Court's electronic filing system, unless counsel for Plaintiff is not registered with the CM/ECF system, in which case the undersigned certifies that a copy of the foregoing document was sent to counsel for Plaintiff via certified mail, return receipt requested.

/s/ Kenneth C. Riney
Kenneth C. Riney